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February 18, 2009

Mr. Brian Bennett
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: Victory in November Election PAC (VINE PAC) FEC ID No. C00378695

1 20 12 140: 00007 0000

Dear Mr. Bennett:

This is in response to your letter dated February 11, 2009 concerning the Year End Report (11/25/08-12/31/08) of VINE PAC (the "Committee").

You ask about expenditures for "Fundraising Consulting Services." These expenditures were for fundraising on behalf of the Committee and were not made on behalf of any specifically identified federal candidate.

We hope that this information adequately addresses your question. If you need any further information, please do not hesitate to contact the Committee.

Very truly yours,

Marc Elias Counsel to VINE PAC [EndText]